

1 GARMAN TURNER GORDON LLP  
2 GERALD M. GORDON  
3 Nevada Bar No. 229  
4 E-mail: ggordon@gtg.legal  
5 JARED SECHRIST  
6 Nevada Bar No. 10439  
7 E-mail: jsechrist@gtg.legal  
8 7251 Amigo St., Suite 210  
9 Las Vegas, Nevada 89119  
10 Tel: (725) 777-3000 / Fax: (725) 777-3112

11 MICHAEL D. NAPOLI, ESQ.  
12 *Pro hac vice*  
13 AKERMAN LLP  
14 2001 Ross Avenue, Suite 3600  
15 Dallas, Texas 75201  
16 Tel: (214) 720-4360 / Fax: (214) 720-8116  
17 ARIEL E. STERN, ESQ.  
18 Nevada Bar No. 8276  
19 AKERMAN LLP  
20 1635 Village Center Circle, Suite 200  
21 Las Vegas, Nevada 89134  
22 Tel: (702) 634-5000 / Fax: (702) 380-8572  
23 Email: ariel.stern@akerman.com

24 *Attorneys for Tecumseh-Infinity Medical  
25 Receivable Fund, LP*

26 **IN THE UNITED STATES BANKRUPTCY COURT  
27 FOR THE DISTRICT OF NEVADA**

28 In re:

11 INFINITY CAPITAL MANAGEMENT, INC.

12 Debtor.

13 HASELECT-MEDICAL RECEIVABLES  
14 LITIGATION FINANCE FUND  
15 INTERNATIONAL SP,

16 Plaintiff,

17 v.

18 TECUMSEH-INFINITY MEDICAL  
19 RECEIVABLES FUND, LP,

20 Defendant.

11 Case No. 21-14486-abl  
12 Chapter 7

13 Adversary Case No. 21-01167-abl

14 **STIPULATION TO EXTEND  
15 DISCOVERY DEADLINES AND  
16 CONTINUE TRIAL DATE  
17 (THIRD REQUEST)**

1 TECUMSEH-INFINITY MEDICAL  
2 RECEIVABLES FUND, LP,

3 Counter-Claimant,

4 v.  
5 HASELECT-MEDICAL RECEIVABLES  
6 LITIGATION FINANCE FUND  
7 INTERNATIONAL SP,  
8 Counter-Defendant.

9 HASELECT-MEDICAL RECEIVABLES  
10 LITIGATION FINANCE FUND  
11 INTERNATIONAL SP,

12 Counter-Claimant

13 v.  
14 TECUMSEH-INFINITY MEDICAL  
15 RECEIVABLES FUND, LP,

16 Counter-Defendant.

17 **STIPULATION TO EXTEND DISCOVERY DEADLINES AND CONTINUE  
18 TRIAL DATE (THIRD REQUEST)**

19 Tecumseh-Infinity Medical Receivables Fund, LP (“Tecumseh”), by and through its  
20 undersigned counsel, and HASelect-Medical Receivables Litigation Finance Fund International SP  
21 (“HASelect”), by and through its undersigned counsel (each a “Party” and, collectively, the  
22 “Parties”), hereby agree and stipulate, pursuant to Local Rule 7026, to extend discovery deadlines  
23 and trial as follows:

24 **A. Discovery Completed**

25 The following discovery has been completed:

26 1. On or about January 12, 2022, HASelect served a subpoena on nonparty Three Bell  
27 Capital.

28 2. On or about January 12, 2022, HASelect served a subpoena on nonparty Jonathan

1 Porter.

2 3. On or about January 17, 2022, Tecumseh served its Initial Disclosures pursuant to  
3 FRCP 26 on HASelect.

4 4. On or about January 18, 2022, HASelect served its Initial Disclosures pursuant to  
5 FRCP 26 on Tecumseh.

6 5. On or about March 10, 2022, HASelect served its First Set of Interrogatories and  
7 Requests for Production on Tecumseh.

8 6. On or about March 29, 2022, Tecumseh served its First Set of Requests for  
9 Production on HASelect.

10 7. On or about April 18, 2022, Tecumseh served its Responses to HASelect's First Set  
11 of Interrogatories and Requests for Production.

12 8. On or about May 18, 2022, HASelect served its Responses to Tecumseh's First Set  
13 of Requests for Production.

14 9. On or about August 29, 2022, Tecumseh served its First Set of Interrogatories and  
15 Requests for Admission as well as its Second Set of Requests for Production on HASelect.

16 10. On or about September 9, 2022, HASelect served its deposition notice for the  
17 deposition of Tecumseh.

18 11. On or about September 9, 2022, HASelect served deposition subpoenas on various  
19 nonparties.

20 12. On or about September 28, 2022, HASelect served its Responses to Tecumseh's First  
21 Set of Interrogatories and Requests for Admission as well as its Second Set of Requests for  
22 Production on HASelect.

23 13. On or about November 28, 2022, Tecumseh served its Third Set of Requests for  
24 Production on HASelect.

25 14. On or about December 2, 2022, Tecumseh served its Subpoena to Produce  
26 Documents to GPMicro, Inc.

27 15. On or about December 28, 2022, HASelect served deposition subpoenas on various  
28 nonparties.

16. On or about January 5, 2023, Tecumseh served deposition subpoenas for HASelect  
2 and other various nonparties.

3 **B. Discovery Remaining**

4 Discovery in this case has been ongoing and additional discovery remains to be completed,  
5 including, but not limited to:

- 6 1. Depositions of each party or the party's representative(s);
- 7 2. Depositions of various third parties;
- 8 3. Responses to outstanding written discovery;
- 9 4. Supplementation of prior written discovery;
- 10 5. Meet and confer regarding allegedly deficient discovery responses; and
- 11 6. Possible motion practice regarding allegedly deficient discovery responses.

12 The Parties reserve their right to take additional depositions based on information disclosed  
13 in produced documents or obtained in the depositions the Parties have identified.

14 **C. Reasons Why Discovery Will Not Be Completed Within the Time Limit of the Existing  
15 Deadlines**

16 This case is complex and involves thousands of accounts receivable purchased from more  
17 than 100 different medical providers. While this Court has already ruled on some of the issues  
18 regarding a subset of the accounts receivable at issue, other accounts receivable remain that require  
19 further discovery and analysis. The Parties have worked diligently by engaging in discovery from  
20 the outset of this case, but the extent of the documents produced in this matter are voluminous and  
21 require additional time for review. Further, although depositions have been noticed, they will likely  
22 need to be pushed back to accommodate the Parties as well as non-party deponents' schedules and  
23 receipt of further discovery from third party subpoenas and party disclosures. There are also  
24 outstanding issues regarding allegedly deficient discovery responses that will require that the Parties  
25 meet and confer, which may also require motion practice.

26 The Parties believe that, given the situation as it presently exists, discovery cannot be  
27 accomplished by the represented deadlines in the Order Granting the Parties' Stipulation to Extend  
28

1 Discovery Deadlines (Second Request) on file herein [ECF No. 155]. This third stipulation to extend  
2 the existing discovery deadlines is brought in good faith and not for the purpose of delay. Based on  
3 the information presented in this Stipulation, the Parties believe that good cause exists to extend  
4 discovery as proposed in order to permit the Parties to ensure that discovery is conducted in a  
5 thorough manner and to continue trial.

6 **D. Proposed Agreement and Amended Discovery Schedule**

7 Based on the foregoing, the Parties stipulate and agree as follows, subject only to entry of  
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2 proposed order by this court approving this Stipulation, substantially in the form attached hereto  
3 as **Exhibit A**:

4 1. The Parties agree to extend the discovery deadlines as follows:

Event Deadline	Current Date	Proposed Date
Close of Fact Discovery	1/30/2023	3/30/2023
Dispositive Motion Deadline	3/2/2023	5/1/2023
Final List of Witnesses and Exhibits	3/16/2023	5/15/2023
Expected trial ready date	3/31/2023	5/30/2023

10 2. This matter is presently scheduled to go to trial beginning on April 3, 2023. The  
11 extension of discovery deadlines requested herein will require a continuance of this trial date.

12 **IT IS SO STIPULATED.**

13 GARMAN TURNER GORDON LLP

SHEA LARSEN

14 By: /s/ Jared Sechrist

/s/ Bart Larsen

15 GERALD M. GORDON, ESQ.  
JARED SECHRIST, ESQ.,  
7251 Amigo St., Suite 210  
Las Vegas, Nevada 89119  
and

Bart K. Larsen, Esq.  
Nevada Bar No. 8538  
Kyle M. Wyant, Esq.  
Nevada Bar No. 14652  
1731 Village Center Circle, Suite 150  
Las Vegas, Nevada 89134

16 MICHAEL D. NAPOLI, ESQ.  
*Pro hac vice*

17 AKERMAN LLP  
2001 Ross Avenue, Suite 3600  
Dallas, Texas 75201  
Tel: (214) 720-4360 / Fax: (214) 720-8116

18 *Attorneys for HASelect-Medical Receivables  
Litigation Finance Fund International SP*

19 ARIEL E. STERN, ESQ.

20 Nevada Bar No. 8276

21 AKERMAN LLP

22 1635 Village Center Circle, Suite 200

23 Las Vegas, Nevada 89134

24 Tel: (702) 634-5000 / Fax: (702) 380-8572

25 Email: [ariel.stern@akerman.com](mailto:ariel.stern@akerman.com)

26 *Attorneys for Tecumseh-Infinity Medical  
Receivable Fund, LP*

# EXHIBIT A

# EXHIBIT A

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7 GARMAN TURNER GORDON LLP  
8 GERALD M. GORDON  
9 Nevada Bar No. 229  
10 E-mail: ggordon@gtg.legal  
11 JARED SECHRIST  
12 Nevada Bar No. 10439  
13 E-mail: jsechrist@gtg.legal  
14 7251 Amigo St., Suite 210  
15 Las Vegas, Nevada 89119  
16 Tel: (725) 777-3000 / Fax: (725) 777-3112

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22 Tel: (214) 720-4360 / Fax: (214) 720-8116  
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25 AKERMAN LLP  
26 1635 Village Center Circle, Suite 200  
27 Las Vegas, Nevada 89134  
28 Tel: (702) 634-5000 / Fax: (702) 380-8572  
Email: ariel.stern@akerman.com

19 *Attorneys for Tecumseh-Infinity Medical  
20 Receivable Fund, LP*

21 **IN THE UNITED STATES BANKRUPTCY COURT  
22 FOR THE DISTRICT OF NEVADA**

23 In re:  
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25 INFINITY CAPITAL MANAGEMENT, INC.  
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27 Debtor.

28 Case No. 21-14486-abl  
Chapter 7

Adversary Case No. 21-01167-abl

29 HASELECT-MEDICAL RECEIVABLES  
30 LITIGATION FINANCE FUND  
31 INTERNATIONAL SP,

32 Plaintiff,

33 v.  
34  
35 TECUMSEH-INFINITY MEDICAL  
36 RECEIVABLES FUND, LP,

37 **ORDER GRANTING STIPULATION  
38 TO EXTEND DISCOVERY  
39 DEADLINES AND CONTINUE TRIAL  
40 DATE (THIRD REQUEST)**

41 Defendant.

1 TECUMSEH-INFINITY MEDICAL  
2 RECEIVABLES FUND, LP,

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4 v.  
5 HASELECT-MEDICAL RECEIVABLES  
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7 INTERNATIONAL SP,

8 Counter-Defendant.

9 HASELECT-MEDICAL RECEIVABLES  
10 LITIGATION FINANCE FUND  
11 INTERNATIONAL SP,

12 Counter-Claimant

13 v.  
14 TECUMSEH-INFINITY MEDICAL  
15 RECEIVABLES FUND, LP,

16 Counter-Defendant.

17 **ORDER GRANTING STIPULATION TO EXTEND DISCOVERY DEADLINES AND  
CONTINUE TRIAL DATE (THIRD REQUEST)**

18 The Court having considered the *Stipulation to Extend Discovery Deadlines and Trial*  
19 *Readiness Date (Third Request)* (“**Stipulation**”),<sup>1</sup> by and between Tecumseh-Infinity Medical  
20 Receivables Fund, LP (“Tecumseh”), by and through its undersigned counsel, and HASelect-  
21 Medical Receivables Litigation Finance Fund International SP (“HASelect”), by and through its  
22 undersigned counsel, and finds that good cause exists to grant the relief requested. Accordingly:

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<sup>1</sup> Any capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Stipulation.

1           **IT IS ORDERED** that the Stipulation is approved in its entirety.

2           **IT IS FURTHER ORDERED** that the discovery deadlines are extend as follows:

3 <b>Event Deadline</b>	4 <b>Current Date</b>	5 <b>Proposed Date</b>
Close of Fact Discovery	1/30/2023	3/30/2023
Dispositive Motion Deadline	3/2/2023	5/1/2023
Final List of Witnesses and Exhibits	3/16/2023	5/15/2023
Expected trial ready date	3/31/2023	5/30/2023

8           **IT IS FURTHER ORDERED** that the extension of discovery deadlines requested herein  
 9 will require a continuance of this trial date, and, therefore, this matter shall begin trial beginning on  
 10 May 30, 2023.

11           **IT IS SO ORDERED.**

12           Prepared by:

13           GARMAN TURNER GORDON LLP

14           By: /s/           Jared Sechrist  
 15           GERALD M. GORDON, ESQ.  
 16           JARED SECHRIST, ESQ.,  
 17           7251 Amigo St., Suite 210  
 18           Las Vegas, Nevada 89119  
 19           and

20           MICHAEL D. NAPOLI, ESQ.  
 21           *Pro hac vice*

22           AKERMAN LLP  
 23           2001 Ross Avenue, Suite 3600  
 24           Dallas, Texas 75201  
 25           Tel: (214) 720-4360 / Fax: (214) 720-8116

26           ARIEL E. STERN, ESQ.  
 27           Nevada Bar No. 8276  
 28           AKERMAN LLP  
 29           1635 Village Center Circle, Suite 200  
 30           Las Vegas, Nevada 89134  
 31           Tel: (702) 634-5000 / Fax: (702) 380-8572  
 32           Email: [ariel.stern@akerman.com](mailto:ariel.stern@akerman.com)  
 33           *Attorneys for Tecumseh–Infinity Medical*  
 34           *Receivable Fund, LP*